

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2020- 225-WS**

IN RE: Joint Application for Approval of  
the Sale of Assets and Transfer of Facilities,  
Territory, and Certificate of Public  
Convenience and Necessity from CUC,  
Incorporated to South Carolina Water  
Utilities–CUC, Inc

**MOTION FOR CONFIDENTIAL  
TREATMENT**

Applicants, South Carolina Water Utilities-CUC, Inc. (“SCWU”) and CUC, Incorporated. (“CUC”) by counsel, and under S.C. Code Ann. §§ 30-4-40(a), 39-8-20(5), and S.C. Code Regs.103-804(S)(2), move for Confidential Treatment in the above-captioned proceeding. Applicants request confidential treatment by the Public Service Commission (“Commission”) of certain commercially sensitive financial information filed under seal supporting their application for approval of the sale of assets and transfer of facilities, territory, and certificate of public convenience and necessity from CUC to SCWU.

**I. Description of Confidential Information**

*Appendix A (Cash Management Practices) to the Stipulation between the Joint Applicants and the Office of Regulatory Staff*, the redacted version of which is attached to the Stipulation Agreement filed with this motion, and the unredacted version of which is filed under seal, contains highly confidential information, the public disclosure of which would endanger the security of SCWU’s financial practices and cause direct, immediate and substantial harm to its competitive position in South Carolina and in other states where parent company does business.

## **II. Grounds for Claim of Confidentiality**

Disclosure of the redacted information would jeopardize SCWU's relationship with its investors and harm the Applicant's ability to compete in the provision of utility services in South Carolina. Neither SCWU nor CUC are public corporations, and their financial and business information is uniquely sensitive. SCWU and CUC are closely held corporations that desire to keep their financial information out of the public realm.

Applicants make considerable efforts to maintain the secrecy of the information of this nature. Financial information of this type is not publicly disseminated, and SCWU guards this information internally. Its disclosure is limited to SCWU's senior officers, counsel, and employees directly involved with its financial operations. When required to submit financial information to public authorities, all such information is stamped "Confidential" and comes with formal requests to maintain the confidentiality of the information and withhold it from public disclosure.

## **III. Conclusion**

Applicants have narrowly tailored their request for confidential treatment and have provided a minimally redacted document for public inspection. The information Applicants want to keep confidential would not affect customer service.

WHEREFORE, Applicants respectfully request the Commission rule the redacted information in Appendix A to the Stipulation Agreement is exempt from public disclosure and provided confidential treatment.

Respectfully submitted,

*s/ Charles L.A. Terreni*

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Columbia, South Carolina